LABORATORY ACTIVITIES

INTRODUCTION

On June 19, 20 and 21, 2017 the U.S. Environmental Protection Agency's (EPA) National Enforcement Investigations Center (NEIC) laboratory received 69 wastewater samples from nine stations and six trip blanks all collected in June 2017 as part of a focused clean air act compliance investigation of 3V Inc, located in Georgetown, South Carolina. Laboratory sample receipt and inspection information are summarized in **Table 1**. The samples were maintained under custody in accordance with the NEIC operating procedure *Evidence Management*, NEICPROC/00-059R4.

Table 1. LABORATORY SAMPLE RECEIPT AND INSPECTION 3V

Georgetown, South Carolina

Event	Date	Comments
Samples received	June 19, 2017	Delivered to NEIC by FedEx (tracking No.7389 6763 2065) and received by chemist Robyn Hallowell (R. Hallowell).
Samples unpacked and inspected	June 19, 2017	Shipping container was a red cooler secured with packing tape. A padlock/hasp assembly on the front was dislodged during shipping. The packing tape was still secure. R. Hallowell unpacked and inspected the contents of the red cooler, which included four aluminum evidence cans. In the cans, sealed plastic baggies with water mix and samples. Cooler contained 40-milliliter (mL) volatile vial samples. The chain of custody paperwork was taped inside the cooler. All sample information was verified against the chain of custody record (No. 14266), and the samples were placed into R. Hallowell's cart, which was then locked, and stored in walk-in cooler B in room 1C-210. Upon the full completion of inspection, the chain of
Samples received	June 20, 2017	custody was signed. Samples were given to PAC Angie Hunter (A. Hunter) June 20, 2017. Delivered to NEIC by UPS (tracking No. 1Z A42 01T 84
Samples unpacked and inspected	June 20, 2017	9206 9952) and received by chemist A. Hunter. Shipping container was a blue cooler secured with a padlock/hasp assembly on the front. A. Hunter unpacked and inspected the contents of the blue cooler. Cooler contained 40-mL volatile vial samples, and field sample supplies. The chain of custody paperwork was taped inside the cooler. All the samples were sealed in custody bags. All security seals were intact. All sample information was verified against the chain of custody record (No. 14265), and the samples were placed into A. Hunter's cart, which was then locked, and stored in walk-in cooler B in room 1C-210.
Samples received	June 21, 2017	Delivered to NEIC by UPS (tracking No. 1Z A42 01T 84 9445 5110) and received by chemist A. Hunter.

ENFORCEMENT CONFIDENTIAL – FOIA EXEMPT – DO NOT RELEASE

Table 1. LABORATORY SAMPLE RECEIPT AND INSPECTION 3V Georgetown, South Carolina

Event	Date	Comments
		Shipping container was a blue cooler secured with a padlock/hasp assembly on the front.
Samples unpacked and inspected	June 21, 2017	A. Hunter unpacked and inspected the contents of the blue cooler. Cooler contained 40-mL volatile vial samples, and field sample supplies. The chain of custody paperwork was taped inside the cooler. All the samples were sealed in custody bags. All security seals were intact. All sample information was verified against the chain of custody record (No. 14267), and the samples were placed into A. Hunter's cart, which was then locked, and stored in walk-in cooler B in room 1C-210.

ANALYTICAL PROCEDURES AND ANALYSTS

Table 2 lists the analytical procedures and analysts. All analyses were conducted by NEIC personnel in accordance with the NEIC quality system from June through July 2017. Data quality summaries for all laboratory measurements are maintained in the project file. All laboratory procedures cited in this report are within the scope of NEIC's ISO/IEC 17025 accreditation issued by the ANSI-ASQ National Accreditation Board (certificate No. AT-1646).

Table 2. ANALYTICAL PROCEDURES AND ANALYSTS 3V

Georgetown, South Carolina

	Analytical Method/Procedures	Analyst
•	EPA SW-846 Method 5030B, Purge-and-Trap for Aqueous Samples EPA SW-846 Method 8260B, Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry (GC/MS) Volatile Organic Analysis by Gas Chromatography/Mass Spectrometry, NEICPROC/00-002R5	Angie Hunter
•	EPA SW-846 5021A, Volatile Organic Compounds in Various Sample Matrices Using Equilibrium Headspace Analysis Volatile Organic Analysis by Gas Chromatography/Mass Spectrometry, NEICPROC/00-002R5	Robyn Hallowell

ANALYTICAL RESULTS

The wastewater samples, were analyzed by A. Hunter and R. Hallowell for the presence of ethylbenzene, methanol, methylene chloride, and xylenes using gas chromatography/mass spectrometry (GC/MS). **Table 3** summarizes the analyte concentrations determined in the samples and their associated limit of quantitation (LOQ). The LOQ values were based on the sample preparation, along with the most dilute standard solution used in generating the calibration curve for analyte quantitation.

ENFORCEMENT CONFIDENTIAL – FOIA EXEMPT – DO NOT RELEASE Appendix G

The estimated measurement uncertainty values for analytes summarized in **Table 3** were based on standard data for ethylbenzene ($\pm 16\%$), methylene chloride ($\pm 10\%$), and xylenes ($\pm 17\%$). For methanol ($\pm 10\%$), the uncertainty was based on the highest RSD of triplicates. However, at the lowest concentration, the uncertainty becomes larger.

	Table 3. WASTEWATER SAMPLE RESULTS 3V, Inc.					
	Georgetown, South Carolina					
Station #	NEIC Tag#	Analyte	Analyte Concentration (mg/L³)	Limit of Quantitation (LOQ) (mg/L)		
1 ¹	NE39152	Methylene Chloride	1,090,0004	400,000		
1	NE39201	Methylene Chloride	1,150,000 ⁴	400,000		
		Ethylbenzene	34.1	5		
	NE20457 ²	m-&/or p-Xylene	142	5		
2 ¹	NE39157 ²	Methylene Chloride	64.8	5		
		o-Xylene	43.4	5		
	NE39159 ²	Methanol	< LOQ	14		
		Ethylbenzene	34.6	5		
		m-&/or p-Xylene	145	5		
2	NE39214	Methylene Chloride	69.2	5		
		o-Xylene	43.6	5		
	NE39216 ²	Methanol	< LOQ	14		
		Ethylbenzene	2.84	0.5		
		m-&/or p-Xylene	10.8	0.5		
	NE39161	Methylene Chloride	23.8	0.5		
		o-Xylene	3.77	0.5		
	NE39163 ²	Methanol	62	14		
3 ¹		Ethylbenzene	9.73	1		
		m-&/or p-Xylene	41.8	1		
	NE39205	Methylene Chloride	< LOQ	1		
		o-Xylene	13.7	1		
	NE39207 ²	Methanol	< LOQ	14		
		Ethylbenzene	12.2	1		
		m-&/or p-Xylene	53.2	1		
4 ¹	NE39165	Methylene Chloride	20.4	1		
		o-Xylene	18.3	1		
	NE39167 ²	Methanol	92	14		
	NE39169	Ethylbenzene	3.11	0.5		
		m-&/or p-Xylene	13.0	0.5		
		Methylene Chloride	21.2	0.5		
		o-Xylene	4.1	0.5		
	NE39171 ²	Methanol	350	14		
5 ¹		Ethylbenzene	2.85	0.5		
		m-&/or p-Xylene	10.6	0.5		
	NE39189 ²	Methylene Chloride	18.8	0.5		
		o-Xylene	4.11	0.5		
	NE39191 ²	Methanol	220	14		
	MEDATAT	Ethylbenzene	< LOQ	0.05		
		m-&/or p-Xylene	0.167	0.05		
c1	NE39175			0.05		
6 ¹		Methylene Chloride	< LOQ	0.05		
		o-Xylene	< LOQ			
	NE39177 ²	Methanol	1,500	140		
6	NE39218	Ethylbenzene	< LOQ	0.05		
		m-&/or p-Xylene	0.114	0.05		

ENFORCEMENT CONFIDENTIAL – FOIA EXEMPT – DO NOT RELEASE Appendix G

Table 3. WASTEWATER SAMPLE RESULTS 3V, Inc. Georgetown, South Carolina

Station #	NIEIC To ~#	Analyte	Analyte Concentration	Limit of Quantitation (LOQ) (mg/L)
Station #	NEIC Tag#	Methylene Chloride	(mg/L³) < LOQ	0.05
		o-Xylene	< LOQ < LOQ	0.05
	NE39220 ²	Methanol	95,000	14,000
	NESSEE	Ethylbenzene	< LOQ	50
		m-&/or p-Xylene	98.8	50
	NE39179	Methylene Chloride	391	50
		o-Xylene	< LOQ	50
		Ethylbenzene	< LOQ	50
		m-&/or p-Xylene	100	50
	NE39180	Methylene Chloride	343	50
7 ¹		o-Xylene	< LOQ	50
		Ethylbenzene	< LOQ	50
		m-&/or p-Xylene	92.9	50
	NE39181	Methylene Chloride	296	50
		o-Xylene	< LOQ	50
	NE39184	Methanol	650	28
	NE39185	Methanol	640	28
	NE39186	Methanol	660	28
		Ethylbenzene	84.9	50
		m-&/or p-Xylene	376	50
_	NE39210	Methylene Chloride	1220	50
7		o-Xylene	93.3	50
	NE39212 ²	Methanol	110	14
	NE39212	Ethylbenzene	< LOQ	5
		m-&/or p-Xylene	< LOQ	5
8 ¹	NE39193	Methylene Chloride	< LOQ	5
· ·		o-Xylene	< LOQ	5
	NE39195 ²	Methanol	460	14
	14233133	Ethylbenzene	< LOQ	5
		·		5
o	NE39222 ²	m-&/or p-Xylene Methylene Chloride	< LOQ 8.17	5
8				5
	NE2022 42	o-Xylene	< LOQ	
	NE39224 ²	Methanol	99	14
		Ethylbenzene	234	50
01	NE39197	m-&/or p-Xylene	1070	50
9 ¹		Methylene Chloride	70.1	50
		o-Xylene	343	50
	NE39199 ²	Methanol	33	14
		Ethylbenzene	< LOQ	0.001
_		m-&/or p-Xylene	< LOQ	0.001
Trip Blank ¹	NE39155	Methylene Chloride	0.006	0.001
		o-Xylene	< LOQ	0.001
		Methanol	< LOQ	14
	NE39172	Ethylbenzene	< LOQ	0.001
Trip Blank ¹		m-&/or p-Xylene	< LOQ	0.001
ттр ыапк		Methylene Chloride	< LOQ	0.001
		o-Xylene	< LOQ	0.001
- · - · · · · · · · · · · · · · · · · ·		Ethylbenzene	< LOQ	0.001
Trip Blank ¹	NE39173	m-&/or p-Xylene	< LOQ	0.001

ENFORCEMENT CONFIDENTIAL – FOIA EXEMPT – DO NOT RELEASE Appendix G

Table 3. WASTEWATER SAMPLE RESULTS 3V, Inc.

Georgetown, South Carolina

Station #	NEIC Tag#	Analyte	Analyte Concentration (mg/L³)	Limit of Quantitation (LOQ) (mg/L)
		o-Xylene	< LOQ	0.001
		Methanol	< LOQ	14
		Ethylbenzene	< LOQ	0.001
		m-&/or p-Xylene	< LOQ	0.001
Trip Blank ¹	NE39187	Methylene Chloride	< LOQ	0.001
		o-Xylene	< LOQ	0.001
		Methanol	<loq< td=""><td>14</td></loq<>	14
		Ethylbenzene	< LOQ	0.001
		m-&/or p-Xylene	<loq< td=""><td>0.001</td></loq<>	0.001
Trip Blank ¹	NE39208	Methylene Chloride	0.001	0.001
		o-Xylene	<loq< td=""><td>0.001</td></loq<>	0.001
		Methanol	<loq< td=""><td>14</td></loq<>	14
		Ethylbenzene	<loq< td=""><td>0.001</td></loq<>	0.001
		m-&/or p-Xylene	< LOQ	0.001
Trip Blank	NE39225	Methylene Chloride	< LOQ	0.001
		o-Xylene	< LOQ	0.001
		Methanol	< LOQ	14

¹ 14 day hold time missed or samples did not come in on ice. Concentrations should be considered a minimum value.

 $^{^{2}}$ Results are from triplicate tests; n = 3.

³ mg/L = milligrams per liter.

⁴ Determined concentrations above 100% are due to the dilution ratios of the samples.